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9 *Attorneys for Plaintiff X Corp.*

10
11 UNITED STATES DISTRICT COURT
12 EASTERN DISTRICT OF CALIFORNIA
13 SACRAMENTO DIVISION

14 X CORP.,

15 Plaintiff,

16 v.

17 ROBERT A. BONTA, Attorney
18 General of California, in his
official capacity, and
19 SHIRLEY N. WEBER, Secretary of
State of California, in her
official capacity,

20 Defendants.

Case No. 2:24-cv-03162-WBS-CSK

NOTICE OF RELATED CASES

1 Pursuant to Local Rule 123, Plaintiff X Corp. hereby notifies
2 the Court of the following related case: *Rumble Inc. v. Bonta*, No.
3 24-cv-03315-DC-CKD. Plaintiff previously notified the Court of
4 the related cases *Kohls v. Bonta* and *The Babylon Bee, LLC v. Bonta*,
5 consolidated at No. 24-cv-2527-JAM-CKD – see Order Consolidating
6 Cases, No. 24-cv-2527-JAM-CKD, ECF No. 20 (E.D. Cal. Oct. 25, 2024)
7 – that are related both to *X Corp.* and *Rumble Inc.*

8 *X Corp.*, *Rumble Inc.*, *Kohls*, and *The Babylon Bee, LLC* share
9 significant similarities, such that assignment of *X Corp.* and
10 *Rumble Inc.* to Judge John A. Mendez and Magistrate Judge Carolyn
11 K. Delaney would likely affect a substantial savings of judicial
12 effort and is also likely to be convenient for the parties.

13 First, *X Corp.*, *Rumble Inc.*, *Kohls*, and *The Babylon Bee, LLC*
14 involve the same Defendants – Robert A. Bonta and Shirley N. Weber.

15 Second, *X Corp.*, *Rumble Inc.*, *Kohls*, and *The Babylon Bee, LLC*
16 involve similar claims challenging the constitutionality of the
17 same California law, California Assembly Bill (“AB”) 2655. Compare
18 Complaint ¶¶ 96-113, 130-145, *X Corp.*, ECF No. 1, with Complaint
19 ¶¶ 109-142, *Rumble Inc.*, ECF No. 1, with Complaint ¶¶ 109-144, 191-
20 194, *Kohls*, ECF No. 1, with Complaint ¶¶ 344-379, *The Babylon Bee*,
21 *LLC*, ECF No. 21.

22 Third, the Court has already found that *The Babylon Bee, LLC*
23 and *Kohls* are “related within the meaning of Local Rule 123.” Order
24 Consolidating Cases, No. 24-cv-2527-JAM-CKD, ECF No. 20 (E.D. Cal.

1 Oct. 25, 2024). This led to assignment of *The Babylon Bee, LLC*
2 and *Kohls* to Judge John A. Mendez to effect "a substantial savings
3 of judicial effort" and promote the convenience of the parties."
4 *Id.*

5 *X Corp., Rumble Inc., Kohls, and The Babylon Bee, LLC* thus
6 have a significant overlap in questions of fact, law, and requests
7 for relief, and Judge Mendez is already familiar with the legal
8 issues. Therefore, assigning *X Corp.* and *Rumble Inc.* to Judge
9 Mendez will likely save substantial judicial and party resources.

10
11 Dated: December 3, 2024

12
13 By: /s/ William R. Warne
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PROOF OF SERVICE

I hereby certify that I caused to be filed a true and accurate copy of the foregoing document with the Clerk of Court using the CM/ECF system, which automatically sends an electronic notification to all attorneys of record in this case. I also certify that I will caused to be emailed the file-stamped copy of the foregoing document to all attorneys of record in *Rumble Inc, et al. v. Bonta et al., Case No. 2:24-cv-03315*, and to serve all parties in this instant matter.

DATED: December 3, 2024

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